REMARKS

I. Introduction

Applicant appreciates the thorough examination of the application that was manifested in the Office action of 09 September 2004 (Paper 10). Of claims 1-23, currently pending in the present application, claims 7, 8 and 16 have been amended, with no new matter entered. In view of the foregoing arguments, applicant respectfully submits that the Office action be reconsidered.

II. Specification

A substitute specification (marked-up and clean copies) is being submitted contemporaneously with the present response as an attachment thereto. The Office action's remarks made with regard to the substitute specification submitted earlier as an attachment to Paper 9 have been taken into consideration and met.

The substitute disclosure technically coincides with what was published in the PCT application WO0014684 differing therefrom mainly style-wise. Included in the substitute specification being submitted herewith and absent in the PCT specification are:

1. A portion of section **[0035]** mentioning vector images and multi-dimensional images, the former being taken from claim 12 and the latter from claim 20 of the PCT application.
2. A portion of section **[0053]** showing what type of memory known in the art can be used for memory units of the present invention.
3. Section **[0074]** whose content has been taken from claim 9 of the PCT application.
4. Section **[0079]** whose content has been formed based on Figure 8 of the PCT application.
5. Section **[0081]** whose content has been taken from claim 3 of the PCT application.
6. Section **[0082]** whose content has been taken from claim 4 of the PCT application.

7. Section **[0087]** whose content has been taken from claims 21-23 of the PCT application.

The substitute specification attached hereto contains no new matter.

In view of the above, applicant respectfully submits that the substitute specification be entered.

III. Claim rejection under 35 USC § 112

III.1. Claims 1 and 6 were rejected under 35 U.S.C. § 112, second paragraph with regard to the applicant's use of the term "comparing" in those claims. In claim 1, the Office action suggests, "comparing" ought to be amended to "selecting."

III.2. Applicant respectfully disagrees. The term "comparing" is used in its regular meaning - examining in order to observe or discover similarities or differences (See, for example, Webster New World Dictionary for *compare*). As to "selecting," *to select* means "to choose or pick out from among others, as for excellence, desirability, etc.) (*Ibid.*)

The examining can be performed in different known ways – by dividing, by subtracting, etc., but not by selecting, which, on the other hand, may be a result of comparing.

Claim 1 mentions "comparing" in the context of "comparing said correlation value with correlation values for the corresponding (by their location in the image) pixels in other said high frequency channels and with a first threshold value for this channel". The specification describes the detailed mechanism of this comparison on pages 14, line 7 – page 15, line 4 (sections **[0077]**, **[0078]**, **[0080]**, **[0081]** and added section **[0079]** of the substitute specification) with a reference to Fig.8 and Fig.4. The specification states inter alia: "This product is the unnormalized correlation value for the processed pixel. **It is compared** to the threshold value **by dividing** by this threshold value ... (*emphasis added*)" The comparison is made inside the look up tables 25_1 - 25_4 as the values of weighting coefficients stored in these look up tables depend on the correlation values from all 4 channels. The preferred dependence of the weighting coefficient on the correlation values is shown in Fig.8. The

comparison to the "maximal correlation value L in other 3 channels" (that means, in more generic terms, comparing the correlation value C_i to the correlation values in other three channels) is based on relationship between C_i and L, and it results in selecting one of the curves A...E. "[C]omparing said corresponding correlation value to said first threshold value" (Claim 6) is performed by dividing the correlation value by the first threshold value as described in the specification (page 13, line 21 - page 14, line 6). Furthermore, "comparing said correlation value with correlation values for the corresponding ... pixels in other said high frequency channels" results in selecting the weights from the look up tables as described in the specification (page 14, line 7 - page 15, line 4).

III.3. Regarding claim 7, the phrase "for example" that caused objection in the Office action has been stricken out of the claim.

IV. Claim objections

Claims 16, 21, 22, and 23 were objected to as having no antecedent basis for "said threshold values."

Applicant respectfully disagrees. Claims 16, and 21-23 depend on the Claim 1. Claim 1 refers to "calculating in each of said n-1 high frequency channels ... a correlation value ... followed by comparing said correlation value with correlation values ... and with a first threshold value for this channel." It is clear from the context of Claim 1 that (i) there are several frequency channels and (ii) the individual "first threshold value" is used for comparing the correlation values in each of these frequency channels. Therefore Claim 1 deals with as many (even possibly different) threshold values as there are high frequency channels.

For that reason, applicant believes that claim 1 provides enough support for "said threshold values" in claim 16. However, it turned out possible to amend the phrase in claim 16 for "said threshold value for each of all high frequency channels" with the understanding that the correction does not change the scope of protection and that it means that there are as many threshold values as there are high frequency channels.

As to claims 21-23, their content was made a subject of a new section added to the specification that corresponds to section **[0087]** in the substitute specification. As such, section **[0087]** is believed to provide the necessary support for "different threshold values" and "said threshold values" in claims 21-23.

V. Drawings

The drawings were objected to because they fail to show output arrows for numerals 11 and 14_0 of Figure 2 as described in the specification.

Figures 1-8 have been replaced in accordance with 37 CFR 1.121 (d), Figure 2 being corrected to overcome the objection.

With the above in view, applicant respectfully submits that the objection be withdrawn.

VI. Claim rejections under 35 USC § 102

Claims 1, 2, 5-17, 19-23 were rejected under 35 U.S.C. § 102(b) as being anticipated by Li et al. (U.S. Patent 5,602,934 A).

Applicant respectfully disagrees.

VI.1. Concerning **"splitting said original image into n frequency channels"** ((8.b) of the Office action): Formally, Li et al. do not mention anywhere in their patent the term "frequency channel". Li et al. do not denote the "structure adaptive low-pass processed image" (Col. 7 L 37) X_{l0} and "high-pass image" X_{h0} (Col. 11 L 19) as "frequency channels". These "images" X_{l0} and X_{h0} are not frequency channels of the original image X_0. The image X_{l0} is a result of the complex *non linear* processing that includes low pass filtering of the original image ($f_{l1}(X_0) - f_{l4}(X_0)$ with a reference to Fig.3 of Li et. al), obtaining the difference images X_0-X_{l1} - X_0-X_{l4}, forming weights W_{l1} - W_{l4} and forming the output image X_{l0} as a sum of four channels with respective weights.

On the other hand, according to the present invention the frequency channels are formed by the *linear* filtering of the original image (specification page 11 lines 6-14 and page 12 lines 14-16, Fig.2).

VI.2. Concerning the difference between the "low pass filtered subimages X_{l1-4}" in the method by Li et al. (Col. 6 lines 12-14) and the "frequency channels" according the present invention, it is worthwhile to note that each subimage by Li et al. includes the low frequency components of the original image (Col. 6 LL 12-14; column 6 LL 20-24). On the contrary, the present invention suggests to isolate the low frequency components in the low frequency channel (Claim 1, lines 10, 11; specification page 6 lines 9,10).

VI.3. Concerning **"detecting edges"** (8.c): Considered formally, Li et al. do not disclose "edge detection" anywhere in their patent. Li et. al describe the method that allows to reduce the negative impact of smoothing on the contrast of image structures by ""choosing" weighted data" from those channels that have smaller difference to the original image (Col. 7 LL 54 – 58 and col. 8 LL 29-34). The smoothing processing described by Li et. al in Col. 7 and 8 and depicted in Fig.3 does not emphasize edges (see Col. 8 L 29: "The filter thus effects a reduced or minimum modification to the original image data..."). On the contrary, the present invention describes the method based on edge detection (Claim 1, lines 12-19; specification page 7 lines 3-14).

Furthermore, the present invention describes specific method of edge detection, namely use of "correlation value between a processed pixel and its neighboring pixels" (Claim 1 lines 13,14). Formally, nowhere in their patent Li et al. mention the term "correlation." The term "correlation" denotes the second order function on the values of pixels of one frequency channel. The "difference between subimage and the original image" disclosed by Li et al. (column 6 LL 53, 54) is not the same as the correlation value. It is not a function of pixel values in the particular channel as it depends on the values of original image. It is not the second order function of pixel values.

VI.4. Concerning **the method of edge detection** (8.c1): The subimages X_{h1}^ ... X_{h4}^ are not the high frequency channels. These subimages are obtained from the processed image X_{l0}. On the contrary, according to the present invention, the high frequency channels are obtained from the original image (Claim 1; specification page 11, lines 5–14, and Figs.2, 6 and 7).

Furthermore, Li et. al disclose the use of the difference between the directionally filtered images (X_{l1} ... X_{l4} and X_{h1} ... X_{h4}) and the original image to minimize the negative

effect of smoothing on the image structures (column 8 LL 29-34). Our method suggests using the correlation between pixels that belong to the same channel. Therefore, the claimed method differs in its principal part from that disclosed by Li et al.: the mathematical operation is different (subtraction in the method by Li et al. vs. multiplication of the pixel value by the sum of values of its neighbors in the claimed method), and the operands are different (the value of pixel from the low pass filtered images X_{l1} ... X_{l4} and the value of pixel from the original image X_0 (equation (4) by Li et al.) vs. values of pixels from the same high frequency channel).

In col. 6 LL27-29, Li et. al disclose the use of four neighboring pixels for the linear low pass filtering. This operation has nothing to do with computation of the correlation value that is a nonlinear operation. Furthermore, $X_{l1}(n1,n2)$ ... $X_{l4}(n1,n2)$ from equation 4 correspond to the four - corresponding by their location - pixels of different low pass filtered channels X_{l1} ... X_{l4} (that is stressed by the use of equal indexes n1,n2) rather than to "four nearest neighboring pixels".

VI.5. Concerning **the method of edge detection in part of comparing correlation values** (8.c2): The formal and principal differences between the correlation value of the claimed method and the difference of the method by Li et al. were addressed in the above.

A careful review of the patent by Li et al. failed to uncover using the threshold value *r* to form the weights W_{l1} ... W_{l4}. The threshold value *r* is used to provide the lower limit for the difference patterns in equations in Col. 13 L 45 and to calculate the auxiliary weight pattern W (Col. 14 L 30). This threshold value is an auxiliary parameter. Calculations of W can be omitted. The weights W_{l1} ... W_{l4} used in the noise suppression part of the method by Li et al. (Fig.3) are formed without using any threshold values. On the contrary, the method according the present invention uses the threshold value to form the weights for the high frequency channels (Claim 1; specification page 14 lines 3-6).

Moreover, the method according to Li et. al uses a single threshold value for all subimages (Col. 13 L 35-39, col. 14 L 30). The claimed method allows using different threshold values for different high frequency channels and for different image regions (Claim 1 lines 16, 17, and Claim 21).

With the above in view, applicant does not believe that detecting edges as claimed in claim 1, is known from Li et al.

VI.6. Concerning **"forming weighting coefficients"** (8.c3): The formal and principal differences between the "correlation value" used to form the weighting coefficients in the claimed method and the "difference" used to obtain weights in the method by Li et al. were addressed in the above.

Further, the method by Li et. al uses two sets of weights: W_{l1} ... W_{l4} for the noise smoothing (Fig.3) and W_{h1} ... W_{h4} for the enhancement of structures (Fig.4). It means that the "assembly" of the output image is made twice, first from the low pass filtered subimages (Fig.3) and then from the high pass filtered subimages and the sum X_{l0} of the low pass filtered subimages (Fig.4). The claimed method uses one set of weights for all n-1 high frequency channels.

VI.7. With regard to **"assembling an output image"** (8.d): Formally, the SNS (sign non symmetric) processing described by Li et al. allows to "prevent overshoots of bright image edges" (Fig.4 and Col. 11 LL 22-31). In this processing, X_{l0} is not a low frequency channel. It is a weighted sum of four low pass filtered images (Fig.3), i.e. the result of the specific *non linear* processing of the original image data. On the contrary, in the method according to the present invention, a low frequency channel is formed by a *linear* low pass filtering of the original image (specification page 11 lines 5 – 14 and Figs.2, 6 and 7).

Similarly, the "high pass image" X_{h0} in the method by Li et al. is not the high frequency channel as it is a result of the complex *non linear* processing of the *low pass* filtered image data (col. 10 LL 2-10 and Fig.4). Assembling of the output image Y0 in the method by Li et al includes no channels that were not subjected to the low pass filtering. The image X_{l0} is the sum the low pass filtered subimages (Fig.3). This feature smoothes structures (edges) in the output image. On the contrary, the claimed method assembles the output image using frequency channels that contain all the information from the original image (specification page 12 lines 11-13).

Furthermore, in the method by Li et al., all "low pass filtered subimages" are subject to multiplication by weights (col. 7 LL 37-39 and equation 6) and the "weight patterns" are

bound by conditions: (i) sum of all patterns is 1 and (ii) each "pattern" (weight) is in the range 0 <= W(i,j) <= 1 (col. 7 L 43 and equation 7). On the contrary, the claimed method does not use any weights for the low frequency channel (Claim 1 lines 20-22; specification page 6 lines 16-21), and the weighting coefficients may take virtually any values (including negative values and values much higher than 1).

The principal difference between the claimed method and that disclosed by Li et al. in part of the edge detection was addressed in the above.

Having regard to the above, applicant believes that Li et al. do not destroy the novelty of claim 1 of the applicant's invention and that claim 1 is thus patentable. Applicant respectfully submits that the 35 U.S.C. §102(b) rejection of claim 1 be withdrawn and claim 1 be allowed.

VI.8. Claims 2, 5-17, 19-23 are believed to be patentable as directly or indirectly dependent from patentable claim 1.

VI.9. The above statement notwithstanding, and as far as claim 2 is concerned, the Office action failed to show in Li et al. that "forming weighting coefficients ... is made by comparing ... *correlation value* to ... threshold value". As a matter of fact, "correlation" is not used in the patent by Li at all, which is not by accident because Li et al. teach comparison of the "difference patterns" to the threshold value – see col. 14, LL 26 – 36 and col. 13 LL 13 – 19.

On that basis, it is believed that claim 2 is patentable.

VI.9. With regard to claim 5, applicant's objection to the rejection of the claim is that the concept of the frequency channel in Li ("four low pass filtered subimages along four major directions" - see col. 6, L 13 – col. 6, L 14, of Li et al.) and in applicant's invention ("splitting of the original image into a low frequency channel and n-1 high frequency channels" – see applicant's specification, page 5, lines 9,10) are different. The Office Action does not follow the logic when it mentions *three* "frequency channels" X_{h2}, X_{h3} and X_{h4} in connection with method by Li et al. to match the demand of applicant's claim 5 because all *four* "subimages" X_{h1}, X_{h2}, X_{h3} and X_{h4} are equivalent in the method by Li et al.

On that basis, it is believed that claim 5 is patentable.

VI.10. With regard to claim 6, applicant's objection to the rejection of the claim is again that the concept of using the correlation value to form weighting coefficients is not disclosed by Li et al., and therefore the knowingness of Li's comparisons is not believed to destroy the novelty of claim 6.

On that basis, it is believed that claim 6 is patentable.

VI.11. With regard to claim 7, col. 6 LL 29, 30 of Li et al. cited in the Office action as related to claim 7 do not disclose anything even remotely resembling representing each pixel by a scalar value that is claimed in claim 7.

With this in view, it is believed that Li et al. do not destroy the novelty of claim 7 and claim 7 is patentable.

VI.12. With regard to claim 8, neither col. 1 L 26 nor col. 6 LL 29, 30, nor equation 6 of Li et al. cited in the Office action to support the §102 rejection of claim 8 show, disclose or teach calculating the correlation value for each pixel by multiplication of the pixel value by a weighted sum of its neighboring pixels. As noted in the above, Li et al. do not deal with correlation values, and therefore do not disclose operations conducted with them. Rather, the cited lines from Li et al. deal with low pass filtering of the original image, which is irrelevant to what is claimed in claim 8.

With this in view, it is believed that Li et al. do not destroy the novelty of claim 8 and claim 8 is patentable.

VI.13. With regard to claim 9, col. 10 LL 2-10 of Li et al. cited in the Office action say verbatim: "The image data $X_{l0}(n_1,n_2)$ from the adaptive low-pass filter of FIG. 3 is high-pass filtered along four directions (...) to obtain further subimage outputs ..." Applicant believes that this citation describing the directional low pass filtering (as well as any other) from Li et al. does not destroy the novelty of claim 9 claiming that "... anisotropic weights are used for calculating said weighted sum of said neighboring pixels" in order to calculate correlation values.

On that basis, it is believed that claim 9 is patentable.

VI.14. With regard to claim 10, the Office action failed to show in Li et al. that "threshold value ... is determined by analyzing distribution of pixel values". As a matter of fact, "distribution" is not used in Li at all, because Li et al. teach determination of the

threshold value as "the average value of the four absolute difference patterns" – col. 13 LL 38, 39 of Li et al.

With this in view, it is believed that Li et al. do not destroy the novelty of claim 10, and it is believed patentable.

VI.15. With regard to claim 11, applicant refers to the objections laid out in connection with claim 10 and believes on that basis that claim 11 is patentable.

VI.16. With regard to claim 12, neither col. 6 LL 29, 30 nor Fig.2 from Li et al. cited in the Office action as related to claim 12 does not disclose anything even remotely resembling representing each pixel by a vector that is claimed in claim 12. Specifically, Fig.2 of Li et al. teaches directions of anisotropic low pass filters.

With this in view, it is believed that Li does not destroy the novelty of claim 12 and claim 12 is patentable.

VI.17. Similarly, with regard to claim 13, neither col. 6 LL 29, 30 of Li et al. cited in the Office action as related to claim 13 does not disclose calculation of correlation values "as a scalar product of said pixel vector by a weighted sum ..." that is claimed in claim 13. A careful review of the patent by Li et al. failed to uncover anything related to the use of vectors and specifically scalar product of vectors. The statement in the Office action that "X_{10} is a scalar product that is a product of vector direction and a weighted sum" contradicts to the definition of X_{10} as "structure adaptive low pass processed image" (col. 7 L 37 of Li et al.).

On that basis, it is believed that claim 13 is patentable.

VI.18. The applicants objections to rejection of claim 14 were addressed in connection with claims 9 and 13.

VI.19. With regard to claims 15 and 16, neither col. 13 LL 33-54 and 8-11 nor col. 11 LL 64-66, nor col. 15 LL 24-31 of Li et al. cited in the Office action as related to claim 15 disclose anything even remotely resembling "analyzing distribution of absolute values of vectors ..." that is claimed in claims 15 and 16. As it was mentioned above in connection with claims 12 and 10, Li et al. teach nothing related to vectors, and specifically related to the distribution of the absolute values of vectors. The statement of the Office action that makes no difference between "distribution of absolute values of vectors" and "selectable kernel length of pixels in column 15, lines 40-50)" does not look correct and cannot be agreed upon.

On that basis, it is believed that claims 15 and 16 are patentable.

VI.20. With regard to claims 17 and 19, all citations of Li et al. cited in the Office action as related to claim 17 do not disclose smoothing "correlation values for several neighboring pixels" (claim 17) or "weighting coefficients over neighboring pixels" (claim 19). Li et al. teach smoothing of pixels of the original image ("four low-pass filters are used to obtain four low-pass filtered subimages ..." – col. 6 LL 12-24).

On that basis, it is believed that claims 17 and 19 are patentable.

VI.21. With regard to claim 21, col. 13 LL 41-54 of Li et al. cited in the Office action says, verbatim: "... the difference patterns are adjusted by: $D'_k = \mathrm{Max}(D_k,\sigma)$; ... where $\sigma = 0.1lr$, where l is the filter level and r is the threshold calculated above." This text describes the method of "adjustment" of the difference patterns, and the threshold value is treated as a constant "calculated above". Col. 13 LL 33-40 describe the method of determination of the threshold value as "the average value of the four absolute difference patterns" over the *whole image* (that is clear from the range of indexes i and j in formula in col. 13 L 35). Applicant believes that these citations from Li et al. do not destroy the novelty of claim 21 claiming that "different threshold values are used for different parts of said image..."

On that basis, it is believed that claim 21 is patentable.

VI.22. With regard to claim 22, neither col. 6 LL 29, 30 nor col. 13 LL 8-54 nor col. 11 LL 54, 55 and 63-66 nor Fig.4 of Li et al. cited in the Office action to support the §102 rejection of claim 22 show, disclose or teach "analyzing *distribution* of pixel values in a corresponding *part* of said image of a corresponding frequency channel" that is claimed in claim 22. As it was mentioned above in connection with claim 21, Li et al. do not teach different threshold values in different parts of the original image; the above objections to the rejection of claim 10 show that Li et al. do not disclose anything related to "analyzing distribution of pixel values".

With this in view, it is believed that Li et al. do not destroy the novelty of claim 22 and claim 22 is patentable.

VI.23. The applicant's objections to the rejection of claim 23 were addressed in connection with claim 22 and further (as far as the pixel representation by a vector is

concerned) in connection with claims 15 and 16.

With this in view, it is believed that Li et al. do not destroy the novelty of claim 23 and claim 23 is patentable.

VII. Claim rejections under 35 USC § 103

Claim 3 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Li et al. in view of Matama (US Patent No. 5,739,922).

Applicant respectfully disagrees.

With respect to claim 3, applicant's objection to the §103 rejection of the claim is two-fold.

First, there must be some suggestion or motivation to combine the references. ("When a rejection depends on a combination of prior art references, there must be some teaching, suggestion, or motivation to combine the references." In re Rouffet, 149 F.3d 1350, 1355, 47 USPQ2d 1453, 1456 (Fed. Cir. 1998) (citing In re Geiger, 815 F.2d 686, 688, 2 USPQ2d 1276, 1278 (Fed. Cir. 1987)). "Obviousness cannot be established by combining the teachings of the prior art to produce the claimed invention, absent some teaching or suggestion supporting the combination." ACS Hosp. Sys., Inc. v. Montefiore Hosp., 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984). Although the suggestion to combine references may flow from the nature of the problem, see Pro-Mold & Tool Co. v. Great Lakes Plastics, Inc., 75 F.3d 1568, 1573, 37 USPQ2d 1626, 1630 (Fed. Cir. 1996), "[d]efining the problem in terms of its solution reveals improper hindsight in the selection of the prior art relevant to obviousness," Monarch Knitting Mach. Corp. v. Sulzer Morat Gmbh, 139 F.3d 877, 880, 45 USPQ2d 1977, 1981 (Fed. Cir. 1998). Therefore, "[w]hen determining the patentability of a claimed invention which combines two known elements, 'the question is whether there is something in the prior art as a whole to suggest the desirability, and thus the obviousness, of making the combination.'" In re Beattie, 974 F.2d 1309, 1311-12, 24 USPQ2d 1040, 1042 (Fed. Cir. 1992) (quoting Lindemann, 730 F.2d at 1462, 221 USPQ at 488).)

There is no such a motivation found either in Li et al. or in Matama to combine those references.

Second, even if such a motivation had existed, the combination would have not represented a corresponding claim of the applicant's invention. The Office action rejects the novelty of Claim 3 in the part of the dependence of the weighting coefficient on the correlation value, namely "a weighting coefficient takes a minimal value for correlation values that are significantly smaller than said first threshold value; said weighting coefficient smoothly increases from its minimal value to its maximal value for correlation values that are close to said first threshold value; and said weighting coefficient takes its maximal value for correlation values that are significantly larger than said first threshold value" (claim 3). Applicant's objection to the rejection of the claim is that the concept of correlation value in Matama ("a correlation value ε among the red, green, and blue three colors" - see col. 15 L 66 – col. 16 L1 of Matama) and in applicant's invention ("correlation between a processed pixel value and values of its neighboring pixels" – see applicant's specification, page 6, lines 14-15) are different. Also, the concept of correlation is not disclosed by Li et al. As a matter of fact, "correlation" is not used by Li at all, which is not accidental because Li et al. derive the "weighting parameters" from the "image difference", or "difference patterns" – see col. 7 LL 58-60, col. 14 LL 26 – 36 and col. 13 LL 13 – 19 of Li et al. Therefore, the knowingness of Matama's correlation and the curves associated therewith is not believed to destroy the novelty of claim 3.

With the above in view, it is believed that the §103 rejection of claim 3 is overcome, and applicant respectfully submits that it be withdrawn.

VIII. Allowable subject matter

Applicant takes into account that claims 4 and 18 would be allowable if rewritten in independent form with all the limitations of the base claim and any intervening claims. The applicant appreciates this possibility but would like to postpone the realization thereof till the consideration of the current response.

IX. Conclusion

All the above considered, claims 1-23 are believed to be in condition for allowance, and this favorable action is hereby respectfully solicited.

Applicant believes that two-month extension fee in the amount of $225.00 is due in submitting this response. For that purpose, an authorization is hereby being given to charge our Deposit Account No. 18-0013, under Order No. 65843-0001, from which the undersigned is authorized to draw.

Respectfully submitted,

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